

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CLOANTO CORPORATION, AMIGA,  
INC.,  
ITEC, LLC and AMINO DEVELOPMENT  
CORPORATION,

Plaintiff,

v.

HYPERION ENTERTAINMENT CVBA,

Defendant.

HYPERION ENTERTAINMENT CVBA,

Counterclaim Plaintiff,

v.

CLOANTO CORPORATION, AMIGA,  
INC.,  
ITEC, LLC and AMINO DEVELOPMENT  
CORPORATION,

Counter-Defendants.

2:18-cv-00381-RSM  
(Consolidated with 2:18-CV-0535)

**DECLARATION OF JOHN J. BAMERT,  
ESQ. IN SUPPORT OF MOTION TO  
WITHDRAW AS COUNSEL**

1 I, John J. Bamert, hereby state and declare as follows:

- 2 1. I am one of the attorneys representing Defendant Hyperion Entertainment C.V.B.A.  
3 (“Hyperion”) in the above-captioned matter. I make the following statements based on my  
4 personal knowledge or upon review of relevant documents. I submit this Declaration in  
5 support of the contemporaneously filed motion to withdraw as counsel. If called to testify  
6 regarding the matters set forth in this declaration, I am competent and willing to do so.
- 7 2. Good cause exists for this withdrawal under multiple subparts of RPC 1.16, which the  
8 undersigned will share with the Court *in camera* if the Court believes such information  
9 may be helpful.
- 10 3. Attached as Exhibit 1 to my declaration is a true and accurate copy of form USM-94 and  
11 its attachments, including translations, as mailed to the Receiving Authority for Belgium  
12 on June 3, 2023, for service on Hyperion under the Hague Convention (duplicates are  
13 omitted from this exhibit but have been mailed to the Receiving Authority). Such  
14 documents have also been mailed to Defendant Hyperion at the address Defendant  
15 Hyperion provided in its Complaint in this case, namely Avenue de Tervueren 34, Brussels,  
16 Belgium 1040. (Dkt. #1, ¶6) Such documents have also been mailed to Defendant Hyperion  
17 at the address shown in the Belgium public records, which are provided in Exhibit 2 to this  
18 declaration, namely Cantersteen 47, 1000 Bruxelles, Belgique. Such documents have also  
19 been mailed to Mr. Ben Hermans, who is the director and principal point of contact for  
20 Defendant Hyperion, at Amerikalei 79 bus 201, 2000 Antwerp, Belgium, as shown in  
21 Exhibit 3. Such documents have also been emailed to Mr. Ben Hermans, which has been  
22 the principal mode of communication.

1 4. Attached as Exhibit 2 to my declaration are true and accurate screen prints of the public  
2 records of Belgium in both unofficial English and official German showing the address of  
3 Defendant Hyperion C.V.B.A.

4 5. Attached as Exhibit 3 to my declaration is a true and accurate screen print of the contact  
5 page of Mr. Ben Hermans's law firm.

6 I declare under penalty of perjury under the laws of the United States of America that the  
7 foregoing is true and correct.

8 //

9  
10  
11 Executed on this 3rd day of June, 2023.

12  
13 BAMERT REGAN

14  
s/ John J. Bamert

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*Attorney for Defendant and Counterclaim  
Plaintiff, Hyperion Entertainment C.V.B.A.*